

Attorney Docket No. P15187

REMARKS/ARGUMENTS**1.) Claim Amendments**

The Applicant has amended claim 1; claims 2-11 and 16-20 have been canceled; and claims 21-28 have been added. Accordingly, claims 1, 12-15, and 21-28 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the foregoing amendments and the following remarks.

2.) Examiner Objections

The Examiner objected to claims 1, 5, 6, 9 and 10 because of informalities. The Applicant has amended or deleted these claims. Consequently, these objections are now moot.

3.) Claim Rejections – 35 U.S.C. § 102(b)

The Examiner rejected claims 1-12 and 14-20 under 35 U.S.C. § 102(b) as being anticipated by Lindquist, et al. (US 5,852,660). The Applicant respectfully traverses this rejection.

Claim 1:

The Applicant has amended claim 1 to better distinguish the claimed invention from Lindquist. Specifically, amended claim 1 now has the following elements:

providing a first numbering plan for use by the first licensed operator network, wherein the first numbering plan specifies the Point Codes used in the first licensed operator network;

providing a second numbering plan for use by the second licensed operator network wherein the second numbering plan specifies the Point Codes used in the second licensed operator network and wherein the first and second numbering plans use a same Point Code configuration numbering plan;

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It is respectfully submitted that although Lindquist may translate traffic between two different networks, Lindquist does not teach the elements of claim 1. Specifically, Lindquist does not provide a mapping between a first numbering plan specifying Point Codes used in a first network and a second numbering plan specifying Point Codes used in the second network, wherein the first and second numbering plans use a same Point Code configuration numbering plan. Thus, all the elements of claim 1 are not taught by Lindquist. Because all elements of modified claim 1 are not taught by Lindquist, a 102 rejection is not proper. The Examiner's consideration of the amended claim is respectfully requested.

Claims 21 to 28 depend from amended claim 1 and recite further limitations in combination with the novel elements of claim 1. Therefore, the allowance of claims 21 to 28 is respectfully requested.

Claim 12:

The Applicant respectfully traverses the rejection of claims 12 through 15. The Applicant has reviewed the references cited by the Examiner, but could not find where Lindquist teaches a database having an identity field associated with Point Codes in an own numbering plan AND an identity field associated with Point Codes in an external numbering plan. Lindquist does indicate that a database 372 is used inside a converter. However, this database is used for conversion and not mapping. Thus, it has an entirely different structure than the claimed elements (see and compare Lindquist col. 6, line 64 to col. 7, line 26). Nothing in Lindquist teaches a database having an identity field associated with Point Codes in an own numbering plan AND an identity field associated with Point Codes in an external numbering plan. Lindquist's database is fully discussed at col. 7, lines 10-26. As readily apparent, it is a completely different structure than claimed in claim 12.

As the examiner is aware, to sustain a 102 rejection, ALL elements of the claim must be taught by the cited art. As the Federal Circuit held:

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Under 35 U.S.C. §102, anticipation requires that each and every element of the claimed invention be disclosed in the prior art. . . . In addition, the *prior art reference must be enabling*, thus placing the allegedly disclosed matter in the possession of the public. *Akzo N.V. v. United States Int'l Trade Comm'n*, 1 USPQ 2d 1241, 1245 (Fed. Cir. 1986), *cert. denied*, 482 U.S. 909 (1987) (Emphasis Added)

Thus, a 102 rejection is not appropriate in this situation because all the elements of claim 12 are simply not taught by Lindquist. Assuming for the sake of argument that all the elements are somehow implied, Lindquist would still not be a proper reference because Lindquist does not provide enough detail about the missing elements to enable one skilled in the art to practice the claimed invention. Thus, a 102 rejection is improper.

Claims 13 to 15 depend from claim 12 and recite further limitations in combination with the novel elements of claim 12. Therefore, the allowance of claims 13 to 15 is also respectfully requested.

4.) Claim Rejections – 35 U.S.C. § 103 (a)

The Examiner rejected claims 13 under 35 U.S.C. § 103(a) as being unpatentable over Lindquist and in view of Shmulevich, et al. (US 2001/0036173). Claim 13 adds additional elements to claim 12. However, Shmulevich does not even deal with Point Codes and certainly does not add the elements of the claimed invention missing from Lindquist. Thus, claim 13 is also patentable for the same reasons that claim 12 is patentable.


CONCLUSION

In view of the foregoing remarks, the Applicant believes all of the claims currently pending in the Application to be in a condition for allowance. The Applicant, therefore, respectfully requests that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

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The Applicant requests a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,



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Date: 10-31-03

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